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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

INTEL CORPORATION and APPLE INC.,

Plaintiffs,

v.

FORTRESS INVESTMENT GROUP LLC,
FORTRESS CREDIT CO. LLC, UNILOC
2017 LLC, UNILOC USA, INC., UNILOC
LUXEMBOURG S.A.R.L., VLSI
TECHNOLOGY LLC, INVT SPE LLC,
INVENTERGY GLOBAL, INC., DSS
TECHNOLOGY MANAGEMENT, INC., IXI
IP, LLC, and SEVEN NETWORKS, LLC,

Defendants.

Case No. 19-7651

**INTEL CORPORATION AND APPLE
INC.'S ADMINISTRATIVE MOTION TO
FILE COMPLAINT CONDITIONALLY
UNDER SEAL**

1 In accordance with Civil Local Rules 7-11 and 79-5, Intel Corporation (“Intel”) and
2 Apple Inc. (“Apple”), submit this motion for an order to seal limited portions of Intel and Apple’s
3 Complaint (the “Complaint”).

4 The Complaint contains information regarding licensing negotiations that one or more
5 defendants or non-parties (“Interested Parties”) may seek to seal. As set forth in the Declaration of
6 Mark D. Selwyn in Support of Intel and Apple’s Administrative Motion to File Complaint
7 Conditionally Under Seal (“Selwyn Decl.”), to the extent the Interested Parties maintain a claim of
8 confidentiality over anything contained in Intel’s and Apple’s Complaint, Intel and Apple expect that
9 the Interested Parties will file declarations in support of sealing this information. Selwyn Decl. ¶ 3.
10 Accordingly, out of an abundance of caution, Intel and Apple file this motion to enable the Interested
11 Parties an opportunity to file a declaration establishing that portions of the Complaint are sealable.
12 For their part, neither Intel nor Apple seeks to seal any portions of the Complaint.

13 For the foregoing reasons, Intel and Apple move to conditionally file the above-referenced
14 document under seal.
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1 Dated: November 20, 2019

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4 By: /s/ Mark D. Selwyn
Mark D. Selwyn

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28 *INTEL CORPORATION, APPLE INC.*

CERTIFICATE OF SERVICE

On this 20th day of November 2019, I hereby certify that I caused the foregoing document entitled Notice of Voluntary Dismissal Without Prejudice to be filed via the court's CM/ECF system, which shall send notice to the counsel of record for the parties.

DATED: November 20, 2019

Respectfully submitted,

By: /s/ Mark D. Selwyn

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